

## Law Offices of Sean R. Cox, L.L.C.

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June 1, 2020

Via ECF

The Honorable Irma Carrillo Ramirez  
United States Magistrate Judge  
United States District Court  
Northern District of Texas  
1100 Commerce Street, Room 1452  
Dallas, TX 75242

Re: No. 3:18-CV-02935-X-BH, *Valerie Jackson v. Lupe Valdez, Marian Brown, and Dallas County, Texas*

Dear Judge Ramirez:

On March 25, 2020, Plaintiff in the above styled case filed a motion to stay proceedings pending resolution of an appeal in relation to a final judgment dismissing Plaintiff's claims against Dallas County, Texas, as well as Lupe Valdez and Marian Brown, in their official capacities. This case is continuing against Lupe Valdez and Marian Brown in their individual capacities, as well as Samuel Joseph, Lizyamma Samuel, and Unknown Dallas County Employee III. Plaintiff filed the motion to stay proceedings due to issues on appeal overlapping with issues regarding the remaining defendants in the case. On April 15, 2020, Defendants filed a response to the motion, and on April 20, 2020, Plaintiff filed a reply supporting the motion.

As of yet, no ruling has been issued on the motion to stay proceedings pending resolution of the appeal and the case is proceeding. The continuation of the case while overlapping issues are concurrently on appeal risks the wasting of resources by both the parties and this Court and the potential for conflicting rulings on factual and legal issues from the court of appeals and this Court. As of now, there is a pending motion for summary judgment and a request to conduct discovery before the Court. Plaintiff respectfully requests a ruling on her motion to stay proceedings pending resolution of the related appeal so as to avoid the problems that will likely arise if the case continues. Thank you for your kind attention to this matter.

Sincerely,

/s/Sean R. Cox

Sean R. Cox

### CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was forwarded to all counsel of record, in a manner authorized by Rule 5, of the Federal Rules of Civil Procedure, on June 1, 2020.

/s/Sean R. Cox

Sean R. Cox